

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

JOHNNY M. HUNT,

Plaintiff,

v.

SOUTHERN BAPTIST CONVENTION;  
GUIDEPOST SOLUTIONS LLC; and  
EXECUTIVE COMMITTEE OF THE  
SOUTHERN BAPTIST CONVENTION

Defendants.

Case No. 3:23-cv-00243

Judge Campbell  
Magistrate Judge Frensley

JURY DEMAND

**NON-PARTY JANE DOE’S MOTION TO PROCEED PSEUDONYMOUSLY  
AND TO REDACT REFERENCES TO HER NAME AND  
IDENTIFYING INFORMATION IN PUBLIC FILINGS**

Jane Doe, referred to in other filings in this case as the “survivor” or “alleged survivor of sexual assault” respectfully requests that this Court allow her to proceed as required in this case under a pseudonym due to the highly sensitive and private nature of the facts regarding her that are involved in this case and her role as a non-party unwillingly drawn into this case. This designation seeks to protect Jane Doe from annoyance, embarrassment, oppression, and undue burden and expense, and more specifically, to safeguard Ms. Doe’s privacy, her physical and emotional well-being, and her and her spouse’s employment prospects and relationships, without prejudicing the existing parties in this case. Prior to this filing, the parties have already de-identified Ms. Doe and her spouse from public filings and placed certain discovery items that contain identifying information about Ms. Doe under this case’s protective order (current version is the Second Amended Agreed Protective Order, ECF Doc. No. 153), pursuant to the Court’s Order (ECF. Doc. No. 76).

In support of this motion, Jane Doe relies on the following:

1. Notice of Subpoena and Subpoena to Testify at a Deposition in a Civil Action (“Subpoena”), Notice of Deposition dated January 17, 2024 (“First Notice”), and Notice of Deposition dated April 2, 2024 (“Second Notice”), served on Jane Doe (attached as Exhibits 1, 2, and 5 respectively to the Declaration of Melissa J. Hogan);
2. Declaration of Melissa J. Hogan and the exhibits thereto; and
3. A memorandum of law filed contemporaneously with this Motion.

Pursuant to Local Rule 37.01(a), counsel for Jane Doe has conferred with counsel for each of the Defendants and counsel for the Plaintiff about this motion. Defendants have communicated that they do not oppose Jane Doe’s position in this motion.

Dated: April 9, 2024

Respectfully submitted,

s/ Melissa J. Hogan

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## **CERTIFICATE OF SERVICE**

The undersigned certifies that on **April 9, 2024**, I electronically filed a true and correct copy of the foregoing with the Clerk of Court for the U.S. District Court Middle District of Tennessee through the Court's Electronic Case Filing System, which will automatically serve all counsel of record listed below:

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By: s/ Melissa J. Hogan